

**ENOVA MEDICAL RESPONSE, INC.
AMBULANCE OPERATOR LICENSE APPLICATION SUMMARY**

ORDINANCE REQUIREMENT	REF. #	SUBMITTED	OMITTED or INCOMPLETE	N/A	COMMENTS
<p>Signed Application Form and Attachments (original with five copies and correct fees) If applicant is a corporation or limited liability company (LLC), the following is also required:</p> <ul style="list-style-type: none"> • Statement of Information • Articles of Incorporation (corporations) • Articles of Organization (LLC) • Certificate of Status 	<p>Application Instructions Section A 7.06.020</p>		<p style="color: red;">X</p>		<p>Application for Enova Medical Response, Inc. (Enova) received on 1/30/2012. Application updates were received on 11/04/2013 as requested. David Malintsyan is identified as the Enova President on the Application form which is dated 1/25/2012 and signed by the Enova President.</p> <p>The Following corporate documentation was also received:</p> <ul style="list-style-type: none"> • A California Secretary of State (SOS) certified copy of the Enova Articles of Incorporation (dated 01/24/2005). • An SOS certified copy of an Enova Statement of Information (dated 01/19/2006) which identifies David Malintsyan as the CEO and Arthur Kirakosian as the Secretary and CFO; David Malintsyan and Arthur Kirkakosian are also listed as Directors for the Corporation. • An SOS certified copy of a Statement of information (dated 12/30/2011) which identifies David Malintsyan as the CEO, Secretary, CFO and sole Director for the Corporation. • Verification of an Internal Revenue Service Taxpayer Identification Number (dated 01/17/2013) for the corporation as indicated on the Application form. <p>The Officer duly authorized to accept service of legal process is not designated on the Application form and an SOS issued Certificate of Status for the corporation was not received.</p> <p>On 1/9/2014 a completed copy of the SOS's "<i>Business Entities Records Order Form</i>", with the required Form checked off and a copy of a check</p>

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					<p>from Enova to the SOS dated 1/2/2014 was received. Additionally, on the Application Form dated 9/5/13, David Malintyan has been designated as the sole officer duly authorized to accept service of legal process</p> <p>It is noted that the SOS issued Certificate of Status has been ordered and receipt of this document is pending at this time.</p>

ATTACHMENT I – FINANCIAL CAPABILITY

<p>Financial Statements* (must be prepared by a Certified Public Accountant)</p> <ul style="list-style-type: none"> • Current (for the last fiscal year) and/or pro forma (if new company) profit and loss statements • Current Balance Sheet • Current Bank Statement (3 months) • Disclosure of all Liabilities <p><small>*Financial statement shall demonstrate that the applicant has adequate financial health, based on liquidity, profitability, and sustainability, to maintain ambulance service operations.</small></p>	7.16.050 (A) 1-3	X			<p>The following updated financial documentation was submitted on 11/04/2013:</p> <ul style="list-style-type: none"> • A letter signed by a verified Certified Public Accountant (CPA) dated 09/24/2013 confirming preparation of the Enova financial statements. • A Balance Sheet as of 12/31/12. • A Statement of Profit and Loss for Jan. – Dec. 2012 • Bank Statements for the period July 1, 2013 through September 30, 2013. <p>A written statement describing any unpaid judgments, or if none, a statement to that effect, was not submitted. Additionally, due to the length of time since the close of the most recent Enova FY (December 2012), more current financial statements are required to complete the fiscal review.</p>
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					<p>On 1/15/2014 the following financial statements were received:</p> <ul style="list-style-type: none"> • Enova’s 2013 FY Profit and Loss Statement • Enova’s 2013 FY Balance Sheet • Written statements describing liabilities and unpaid judgments against the applicant that included the nature of the transactions or acts giving rise to said judgments • Bank statements for the period of October 1, 2013 through December 31, 2013. <p>It was noted that documentation verifying that the updated financial statements were prepared by a CPA was not received and the revenue included in the financial statements has not been broken down by payor source (e.g. Medicare, Medi-Cal, Private Insurance, etc.) as requested. On 1/15/2014 revised financial statements and documentation that they have been prepared by a CPA was requested from Enova via e-mail.</p> <p>On 1/15/2014 all updated financial documentation received to date was forwarded to the Financial Manager for review and evaluation pending receipt of the revisions requested above.</p> <p>On 1/16/14, a cover letter from a verified CPA and revised financial statements that include a breakdown of the Enova revenue was received and forwarded to the Financial Manager. Results of the financial review are pending at this time.</p> <p>On 2/20/14, the Financial Manager provided documentation that Enova meets the financial requirements specified in the County Code.</p>

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Data showing estimated cost of operating one trip/number of trips per day vehicle must run to be profitable; costs per trip should be itemized. Break-even type formulas may be used to show economic feasibility.	7.16.050 (A) 4			X	Established company. Not required.
ATTACHMENT II – EVIDENCE OF SUPPORT					
Evidence of Support <ul style="list-style-type: none"> • Three (3) written statements, and/or • Written notice of verbal testimony 	7.16.050 (C)	X			<p>Submitted a total of five (5) letters of support as follows:</p> <ul style="list-style-type: none"> • Elva Avina, Office Coordinator Rehab Services-Olympia Medical Center (dated 01/12/2012) • Nathan Alyeshmerni, Administrator-Windsor Gardens Convalescent Center of Los Angeles (dated 01/25/2012) • Marilyn Constantino, Director of Nursing Services – Temple Park Convalescent Hospital, Inc. (dated 01/25/2012) • Rey Pinoliar, Executive Director – Infinity Care East Los Angeles (date 01/24/2012) • BJ Fukuji, PT, MHA – Olympia Medical Center (dated 01/16/2012) <p>The submitted letters of support from Elva Avina, and BJ Fukuji are not acceptable evidence of support statements as these letters must come from responsibly positioned people, institutions, or users of the service; therefore, these letters may not be considered as “Evidence of Support.” Additionally, due to the length of time since the application was submitted, updated letters of support are required.</p>

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					<p>On 1/9/14, five (5) letters of support were submitted as follows:</p> <ul style="list-style-type: none"> • May-Ann Zamora, MSW-ACSW, no title included- U.S. Renal Care, Carson (dated 1/3/14) • Yolanda Cervantes, Director of Intake and Customer Relations Services- Goldstar Rehabilitation & Nursing Care Center (dated 1/6/14) • Alice Kirchner, Director- St. Vincent Medical Center Dialysis Center (dated 1/7/14) • Rosa Salinas, Facility Director- Westside Dialysis Center (dated 12/27/13) • Cissy Gu, Facility Director – U.S. Renal Care (dated 1/7/14) <p>While the letter of support from May-Ann Zamora is not acceptable evidence based on the position of the individual, the minimum of three (3) currently dated letters (signed and on their applicable letterhead) as evidence of support for Enova from responsibly positioned people, institutions, or users of the service is sufficient.</p>
ATTACHMENT III – PROPOSED RATE SCHEDULE					
<p>Proposed Rate Schedule</p> <ul style="list-style-type: none"> • Current Rate Schedule • Written Statement that General Public Rates will not be exceeded 	<p>7.16.280 7.16.290 7.16.310</p>	X			<p>A copy of the Enova rate Schedule labeled “<i>General Public Ambulance Rates Los Angeles County</i>” was submitted (dated 09/05/2013) and does not exceed the rates in place at the time the application was submitted.</p>

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					<p>A written and signed statement (dated 09/05/2013) that Enova "...will not exceed the rates that the County of Los Angeles has implemented in Section 7.16.340." was also submitted. This section of the County Code addresses modification of rates, not the actual rates approved by the Board of Supervisors and specified in the County Code. It was also noted on the Enova rate schedule that was submitted that charges for "Response to call with equipment and personnel at an advanced life support (ALS) level" and "Automated external defibrillator (AED)" were included. Enova is not an approved ALS/Paramedic or AED provider in Los Angeles County; therefore such charges may not be included in the rate schedule. Additionally, charges related to Critical Care Transports (CCTs) (i.e. "Nurse critical car transport – per hour", Respiratory therapist for the first three hours...", Infusion pump (per line), etc.) were also included. Pursuant to the County Code Sections 7.16.040 (D) and 7.16.100 (A) (7), provision of services at the critical care transport (CCT) level requires approval by the EMS Agency. Existing ambulance companies with pending applications that were providing this level of service prior to revision of the County Code on July 28, 2011 were authorized to continue such services until approval of their application.</p> <p>On 1/9/2014 a written, dated and signed statement that at no time will Enova exceed the General Public Rates specified in the Los Angeles County Code was received. A revised rate schedule for Enova which does not exceed the</p>

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					<p>general public rates currently in place and which does not include ALS or CCT charges was received. Documentation that verifies Enova had a CCT program in place prior to July 28, 2011 was not received and therefore indicates that a CCT program is not currently in place for Enova. Therefore, prior to implementation of a CCT program, Enova must submit an application and receive approval as a CCT Provider pursuant to the County Code and as outlined in Reference No. 414, Critical Care Transport (CCT) Provider.</p> <p>It is noted on the revised rate schedule that a charge for Automated External Defibrillator (AED) is still included as an Enova charge and Enova is not an approved AED provider.</p> <p>On 2/19/14 a revised rate schedule that does not include AED charges was received.</p>
ATTACHMENT IV – INSURANCE LIABILITY COVERAGE					
<p>Insurance Liability Coverage A certificate or other evidence of insurance coverage confirming that applicant carries insurance with coverages and limits that are in accordance with the County Code.</p>	<p>7.16.050 (G) 7.16.180 7.16.190</p>		X		<p>The following insurance documents were received:</p> <ul style="list-style-type: none"> • Certificate of Insurance (COI) for Automobile Liability (AL) Insurance issued by Scottsdale Insurance Co (expires 01/22/2014). • COI for Worker’s Compensation (WC) Insurance from Insured Solutions (expires 01/30/2014) <p>Review of the submitted COIs identified the following issues:</p>

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					<ul style="list-style-type: none"> • The AL insurance is for “scheduled autos” and the applicable vehicle schedule was not received. • All insurers must have an AM Best rating that is not less than “A-”. The EMS Agency was unable to determine the AM Best rating for the WC Insurance issued by “Insured Solutions as the NAIC number was not included on the COI. • Evidence of current General Liability (GL) or Professional Liability (PL) insurance was not submitted. <p>The revised and additional insurance documentation previously requested was not been received with the 1/9/14 submission. The issues related to insurance requirements as specified above remain outstanding. Additionally, at this time, the previously submitted AL coverage has expired effective 1/22/2014.</p> <p>On 2/19/14 a Certificate of Insurance (COI) for General Liability (GL) and Automobile Liability (AL) Insurance with AM Best Ratings of “A+” and “A” respectively. The vehicle schedule, is included in the Description section of the COI; however, it includes three (3) vehicles that are not eligible for licensure due to age restrictions. Refer to Vehicle section for additional information.</p> <p>Documentation of current PL coverage was not received and although a note was submitted indicating that documentation of current WC coverage would be provided by 2/21/14, such documentation has not been received to date.</p>

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ATTACHMENT V – MAXIMUM RESPONSE TIMES					
<p>Maximum Response Times Written agreement to respond to requests for service within the County response time standards.</p>	<p>7.16.050 (B) 1-2</p>	<p>X</p>			<p>A written statement (dated 09/05/2013) on company letterhead and signed by David Malintyan, affirming Enova’s Dispatch Response Time Policy, was submitted. The document indicates that Enova agrees to “...comply with the <i>response times as set forth by Section 7.16.050.</i>” and it includes the following specifics:</p> <p><u>Emergency Calls:</u></p> <ul style="list-style-type: none"> • An <u>eight (8) minutes, 59 seconds</u> maximum response time to emergency calls from urban areas. • A <u>twenty (20) minute</u> maximum response time to emergency calls for rural areas. • A response which will be “as quickly as possible” if responding to emergency calls for wilderness areas. • Scheduled calls within 60 minutes • Critical Care transport within 90 minutes from time of call or scheduled pick-up • Non-emergency transport of 90 minutes from time of call or scheduled pick-up.

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ATTACHMENT VI – QUALIFIED MANAGEMENT					
<p>Technically Qualified Management*</p> <ul style="list-style-type: none"> • Organizational Chart • Resume(s)/Curriculum Vitae(s) <p>*Evidence that company has technically qualified managers. Evidence shall include manager's resume showing type/duration of transportation experience, including at least five years of increasingly responsible experience in the operation or management of a basic life support or advance life support service.</p>	7.16.050 (D)	X			<p>In the updated documentation submitted on 09/19/2013 a revised organizational chart showing the reporting relationships of Enova and identification of the management personnel was submitted. Resumes for the President, Medical Director, General Manager and Operations Manager were also submitted as follows:</p> <p><u>David Malintyan, President</u></p> <ul style="list-style-type: none"> • President, Enova Medical Response, Inc. (2005-Present) • Computer Engineer, UPS (2002-2005) • Senior Lead Teller, Wells Fargo Bank (1998-2005) <p><u>Ador A. Bustamante, M.D, Medical Director</u></p> <ul style="list-style-type: none"> • Clinical Preceptor, Nurse Practitioner Program, University of Phoenix (2012-Present) • Medical Director, High Valley Lodge (2010-Present) • Clinical Preceptor, Nurse Practitioner Program, Charles Drew University (2010-Present) • Medical Director, Golden Cross Health Care (2009-Present) • Clinical Preceptor, Nurse Practitioner Program, University of Nevada (2008-2009) • Medical Director, York Glen Medical Center (October 2007-Present) • Medical Director, Los Angeles Hospice (2002-Present) • Attending Physician, Glendale Adventist Medical Center (December 2000-Present)

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					<ul style="list-style-type: none"> • Attending Physician, Verdugo Hills Hospital (December 2000-Present) • Medical Director, Milestone Hospice Los Angeles (2000-2002) • Staff Physician, Sunland Medical Group (December 2000- September 2007) • Staff Physician, Acute Care Clinic Camp Pendleton Naval Hospital (October 1999- November 2000) • Staff Physician, Acute Care Clinic/ER Pensacola Naval Hospital (August 1996- September 1999) <p><u>Aram Grigoryan, General Manager</u></p> <ul style="list-style-type: none"> • General Manager/Administrator, Enova Medical Response, Inc. (June 2013-Present) • Administrative Assistant, Dreamhost (January 2012-June 2013) • Assistant Manager, Appliance Outlet (2007-2009) <p><u>Daniel Mendoza, Field Supervisor/Dispatch Manager</u></p> <ul style="list-style-type: none"> • Field Supervisor/Dispatch Manager, Enova Medical Response, Inc. (August 2008-Present) • Emergency Medical Technician, Enova Medical Response Inc.(February 2008- August 2008) • Security Guard, Guard Systems, Inc. (2007- February 2008) • Parking Enforcement, Inter-Con Security (2006-2007) • Stock Merchandiser, Fry's Electronics (2005-2006)

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					<p>Based on the Organizational Chart submitted, Daniel Mendoza is listed as the Operations Manager; however, Mr. Mendoza's resume indicates that he is currently the Field Supervisor / Dispatch Manager. Additionally, based on Dr. Bustamante's curriculum vitae, he does not meet the requirements to serve as Enova's Dispatch Medical Director. Refer to Attachment VIII – Statement of Work section below for additional information and required action.</p> <p>On 1/9/2014 resumes for Daniel Mendoza, Operations Manager and Vincent Bennett, MD were received as follows:</p> <p><u>Daniel Mendoza, Operations Manager/Q.I. Coordinator</u></p> <ul style="list-style-type: none"> • Operations Manager/Q.I. Coordinator, Enova Medical Response (2010-present) • EMT/Dispatcher, Enova Medical Response (February 2008-2010) • Security Guard, Guard Systems, Inc. (2007- February 2008) • Parking Enforcement, Inter-Con Security (2006-2007) • Stock Merchandiser, Fry's Electronics (2005-2006) <p><u>Vincent J. Bennett, M.D., F.A.A.E.M.</u></p> <ul style="list-style-type: none"> • CEO/President, Continuum Medical Associates (2006-Present) • Medical Director, Long Beach Memorial Noctensivist Program (2009-Present) • Academic Medical Advisor, University of the Antelope Valley (2009-Present)

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					<ul style="list-style-type: none"> • Medical Director of Emergency Services, Lancaster-Palmdale Regional Medical Center (2005-Present) • Regional Medical Director, EMCARE - Western Division (2001-Present) • Medical Director of Emergency Services, Hollywood Presbyterian Hospital (2005-2007) • Medical Director of Emergency Services, Suburban Medical Center (1994-2005) • Chairman Emergency Medicine Committee, Suburban Medical Center (1994-2004) • Associate Medical Director, Hubert Humphrey Urgency Care (2003-2004) <p>Based on the submission of Dr. Bennett's resume it is assumed that he has now been contracted as Enova's Medical Director; however, an updated organizational chart reflecting this change was not submitted, nor does Dr. Bennett's curriculum vitae reflect his affiliation with Enova.</p> <p>On 2/19/14 a revised organization chart to reflect the appointment of Dr. Bennett was received along with an updated resume from Dr. Bennett.</p> <p><u>Vincent J. Bennett, M.D., F.A.A.E.M.</u></p> <ul style="list-style-type: none"> • Chief of EmCare Services (Emergency Medicine/Hospitalist/Anesthesia), Palmdale Regional Medical Center (2013-Present) • Medical Director, Enova Medical Response (2013-Present)

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					<ul style="list-style-type: none"> • Medical Consultant, Coachella Music Festival (2011-Present) • Medical Director, Miss America Pageant (2006) • Medical Director of Emergency Services, Palmdale Regional Medical Center (2005-2013) • Regional Medical Director, EMCARE - Western Division (2001-Present) • Medical Director of Emergency Services, Suburban Medical Center (1994-2005) • Associate Medical Director, Hubert Humphrey Urgency Care (2003-2004)
<p>Adherence to Rules and Regulations <i>Affirmation (page 1)</i> - Disclosure of whether applicant or management personnel has or has not ever:</p> <ul style="list-style-type: none"> • Held any other licenses or franchises during the past ten (10) years. • Had a license revoked or denied 	7.16.050 (I) 1, 3 and 4	X			<p><i>Affirmation (page 1)</i> Forms were submitted for Enova's President, Medical Director, General Manager, and Operations Manager.</p> <p>On 2/19/14 a signed <i>Affirmation (page 1)</i> Form was submitted for the newly appointed Enova Medical Director, Dr. Bennett.</p>
<p>Adherence to Rules and Regulations <i>Affirmation (page 2)</i> - Disclosure of whether applicant or management personnel has or has not ever:</p> <ul style="list-style-type: none"> • Been investigated by any governmental agency • Been convicted of any misdemeanor or felony 	7.16.050 (I) 2-3	X			<p><i>Affirmations (page 2)</i> were submitted for Enova's President, Medical Director, General Manager, and Operations Manager.</p> <p>On 2/19/14 a signed <i>Affirmation (page 2)</i> Form was submitted for the newly appointed Enova Medical Director, Dr. Bennett.</p>

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<p>Adherence to Rules and Regulations Written and signed agreement of ongoing adherence to all rules and regulations for applicant and management personnel.</p>	7.16.050 (I)	X			<p>Written and signed agreements affirming ongoing adherence to all rules and regulations were received for the President, Medical Director, General Manager, and Operations Manager.</p> <p>On 2/19/14 a written and signed agreement affirming ongoing adherence to all rules and regulations was received for the newly appointed Enova Medical Director, Dr. Bennett.</p>
ATTACHMENT VII – BUSINESS FACILITIES / VEHICLES					
<p>Business Facilities Description of premises (including billing area and security measures to protect patient confidentiality) to serve as the base of operations and any other facilities or stations that deploy or house vehicles.</p>	7.16.050 (F)	X			<p>A description of “Facilities and Equipment” for Enova was received. This document outlines the location of Enova’s base of operations at 147 N. Ave. 18, Los Angeles, CA 90031. The facility is a 3000 sq. foot metal warehouse situated on a 7400 sq. foot lot. The building has office space for billing staff, communications department for dispatch, administration offices, two restrooms, supply room, security/electrical room, secured file room, EMT lounge areas, sleeping quarters, and break room/kitchen. The building has street access with a camera focused on the entrance. The property is surrounded by a fence with an automated gate and all vehicles are equipped with gate remote access keys and a security camera is focuses on the gate. The billing office is on the first floor and is staffed with one biller. The room is only accessible from 0830-1700 and all files are securely stored in locked file cabinets or transported to the file storage room. There is a camera focused on the entrance and only designated staff has keys. The room has 2</p>

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					<p>computes, 1 server and files are saved in a double encryption format to meet HIPAA standards. The file storage room is located on the second floor of the building for safe keeping of medical files. It remains locked at all times and the door is equipped with a dead bolt lock and only designated staff has keys. There is also a camera focused on the area.</p> <p>Dispatch is located on second floor and is staffed with 1-2 dispatchers daily. There are 2 computers in the room and a camera is positioned at the entrance of dispatch.</p> <p>Although the Enova's "Facilities and Equipment" document describes the layout of the dispatch center, billing offices, use of encryption for the server, management offices, and crew's quarters, it does not provide information as to how the EMTs hand off patient care records (PCR) and other confidential patient information and the process for storing such records to ensure patient confidentiality. It is also unclear if each computer has user ID and passwords, there is no mention of network security or dispatch software to ensure patient information is secured. It was noted in Attachment VIII that a "<i>HIPAA Business Associate Agreement</i>" was included with the Enova Communication Protocols; however, this document is unsigned and appears to be a Business Associate Agreement template utilized by a company called JetBar Software Services and applicable clients. There is no indication what this software is utilized for, if at all, by Enova.</p>

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					<p>Further, there is no mention if workforce members are required to participate in training for HIPAA or confidentiality requirements for Protected Health Information (PHI).</p> <p>On 1/9/2014 a letter dated 1/4/2014 from JetBar Softward Services describing a billing and CAD interface that is HIPAA compliant was received. A copy of a contract with Enova and JetBar Software Services was also received and indicates that the system is compliant with HIPAA and PHI regulations. Additionally, copies of Enova's Notice of Privacy Practices and HIPAA Training employee acknowledgement that indicates compliance with confidentiality requirements for PHI, was received.</p>
<p>Business Facilities Certificate of Zoning Compliance</p>	<p>7.16.050 (l) 5</p>	<p style="text-align: center;">X</p>			<p>A City of Los Angeles 'Zoning Information Only' letter was submitted describing the parcel number and contact information. A copy of the Parcel Profile Report dated 09/06/2013 was also submitted. Documentation that Enova's business location at 147 North Avenue 18, Los Angeles, CA 90031, is properly zoned for emergency medical transportation was not received.</p> <p>The copy of the letter from the City of Los Angeles with "Zoning Information Only" does not confirm whether the location is zoned for the operation of an ambulance company.</p> <p>On 1/9/2014 an email from the Los Angeles Department of City Planning was received that demonstrates that Enova's current business location is properly zoned for the operation of an ambulance company.</p>

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<p>Vehicles Unit number, license number, VIN, make, model year, model type, mileage, projected vehicle life and patient capacity for each vehicle to be licensed and documentation of the following for each:</p> <ul style="list-style-type: none"> • Vehicle Registration • Odometer Testing and Certification • CHP Vehicle License • Most Recent CHP Inspection 	<p>7.16.050 (F)</p> <p>7.16.040 7.16.210 7.16.215</p>	<p>X</p>			<p>A vehicle listing for eleven (11) vehicles including unit numbers, VIN numbers and year of each vehicle was submitted. Individual vehicle information including the license number, make body type, mileage, projected vehicle life and patient capacity along with copies of odometer testing/certification, ,CHP licenses and CHP inspections reports were also received for the following vehicles:</p> <ul style="list-style-type: none"> • Unit # 101- VIN#1FDSS34P18DB55703 (license number: 88T22433) 2008 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 125,456) • Unit #109- VIN#1FDSS34PX7DA01232 (license number: 8G51815) 2007 Ford AM with capacity for five (5) and one (1) gurney with patient (mileage 218,924) • Unit#110- VIN#1FDSS34P36HB30064 (license number: 8E12580) 2006 AM with capacity for five (5) and one (1) gurney with a patient (mileage 219,556) • Unit #111- VIN#1FDSS34P48DB52312 (license number: 8T57623) 2008 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 120,287) • Unit#112- VIN#1FDSS34P19DA90739 (license number: 8M26792) 2009 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 136,859) • Unit#113- VIN#1GBH396071237460 (license number: 8J31876) 2007 Chevy AM with capacity for five (5) and one (1) gurney with a patient (mileage 136,859)

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					<ul style="list-style-type: none"> • Unit#114- VIN#1FDSS34P28DA57716 (license number: 8J82444) 2008 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 74,386) <p>Copies of current DMV registrations were not received for any of the vehicles and all CHP vehicle permits have expired since submission of the original documentation; however, <u>submission of updated vehicle documentation is not required at this time. Current vehicle documentation will be required upon approval of Enova's Ambulance Operator Business License and prior to licensing of the vehicles.</u></p> <p>On 1/9/2014 updated vehicle listings were submitted and in addition to the vehicles identified above, the following additional vehicles were included:</p> <ul style="list-style-type: none"> • Unit#102- VIN#1FDSS34P55HB32459 (license number: 8M26790) 2005 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 197,787). • Unit#103- VIN#1FDSS34P28DB61221 (license number: 8U98139) 2008 Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 102,172). • Unit#105- VIN#1FDWE35P55HA69628 (license number: 8W81063) Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 174,739). • Unit#107- VIN#1FDSS34P35HA02616 (license number: 7P19435) Ford AM with capacity for five (5) and one (1) gurney with a patient (mileage 143,407).

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					<p>Please be advised pursuant to the County Code, Section 7.16.210, "An initial ambulance vehicle license may not be issued for any vehicle which is greater than <u>eight (8) years old</u> as defined by the initial date the vehicle was first put into service, provided that the date is not greater than one year from the date of its manufacture. The EMS Agency Director may issue an exemption for an additional two (2) years for a <u>currently</u> licensed vehicle only. Therefore, dependent on the dates that Units 102, 105 and 107 were placed into service, they may not be eligible for licensure.</p> <p>On 2/19/14 the previously submitted vehicle listings were resubmitted for Units #s 101, 103, 109, 110, 111, 112, 113 and 114 (eight [8] vehicles total). The vehicles previously identified as potentially exceeding the age limits specified in the County Code (Unit #s 102, 105 and 107 have been omitted from this submission).</p>
<p>Vehicles Color scheme/insignia used to designate ambulances of applicant</p>	<p>7.16.050 (H)</p>	<p style="text-align: center;">X</p>			<p>Color photographs of the right, rear, and front side of an Enova ambulance vehicle were submitted. The color scheme of the ambulance can be described as a white base with a blue stripe down each side of the vehicle. Directly above the blue stripe on the right side of the vehicle is the company logo/name in red/blue, vehicle number is located to the front of the passenger doors on right side of the vehicle. On the rear of the ambulance there is a blue stripe, the Enova logo is on the left rear door below the window, and the unit number in blue on the right rear door under the window. The front of the vehicle has "Ambulance" spelled backwards in blue on the hood. The driver's (left) side of the vehicle is not pictured.</p>

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					On 1/9/2014, a picture of the driver's (left) side of the vehicle and a signed statement from David Malintsyan indicating that "All Enova ambulances have the same color scheme/insignia..." used to designate ambulances of applicant was received.
ATTACHMENT VIII – STATEMENT OF WORK					
<p>Statement of Work</p> <ul style="list-style-type: none"> • Detailed description of area(s) within which applicant is proposing to operate • Copy of all current business licenses held by applicant • Copy of CHP Operators License • Results of most recent CHP inspection 	7.16.050 (E) (I) 5 (J)	X			<p>A "Proposed Operating Areas" document was received on 11/04/2013 that identifies the proposed areas of operation as Culver City, East Compton, Compton, Monterey Park, Florence, Commerce, Alhambra, Glendale, Vernon, Hawthorne, Montebello, Bell, South Pasadena, Bell Gardens, Lynwood, City of Terrace, Maywood, East Los Angeles and El Monte. It is indicated that Enova is requesting seven (7) ambulance licenses from the County of Los Angeles in order to work in the unincorporated areas of the County.</p> <p>The following copies of business licenses held by the applicant were received:</p> <ul style="list-style-type: none"> • Gardena • Glendora • Hawthorne • Inglewood • La Puente • Lomita • Los Angeles • Pasadena • Redondo Beach • Santa Monica • Torrance • West Covina

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					<p>A current CHP Operator License that expires on 01/03/2014 and a current CHP operator inspection report were also submitted.</p> <p>The vehicle listing submitted in Attachment VII identifies nine (9) Enova vehicles operated in Los Angeles County; however, the Statement of Work indicates that licensing is requested for seven (7) vehicles. In order to continue operating any ambulance vehicles in Los Angeles County, upon approval of Enova's Ambulance Operator Business License, all vehicles must be licensed by the County, whether or not they are operated in an incorporated city or unincorporated areas of the County.</p> <p>On 1/9/2014, a revised Statement of Work titled "Proposed Operating Areas" was submitted and indicates that Enova is requesting to license a total eleven (11) ambulances (which is consistent with the number of vehicles submitted and as identified under Attachment VII above. This document also states the cities within which Enova proposes to operate include:</p> <ul style="list-style-type: none"> • Culver City • East Compton • Compton • Monterey Park • Florence • Commerce • Alhambra • Glendale • Vernon • Hawthorne • Montebello

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					<ul style="list-style-type: none"> • Bell • South Pasadena • Bell Gardens • Lynwood • City of Terrace • Maywood • East Los Angeles • El Monte <p>The Statement of Work clearly indicates an understanding that continued operation in Los Angeles County (in the incorporated cities as well as unincorporated areas of the County) is dependent on approval of Enova's application for a Los Angeles County Ambulance Operator Business License and licensing of each vehicle.</p>
<p>Quality Improvement Applicant's EMS Quality Improvement Program Plan</p>	<p>Prehospital Care Policy Manual Ref. No. 620</p>		<p>X</p>		<p>A document titled "Enova Medical Response Continuous Quality Improvement (CQI) Plan" (dated 10/03/2013) was submitted on 11/04/2013.</p> <p>Review of the Enova Quality Improvement (QI) Plan found that a majority of the requirements specified in Reference No. 620, EMS Quality Improvement Program, were addressed. The complete results of this review and the sole deficiency identified are specified in the attached "QI Program Monitoring Worksheet" dated 11/20/2013. Additionally, to further evaluate Enova's QI Program, documentation that demonstrates the implementation of Enova's QI program and a copy of Enova's general policies and procedures is required.</p>

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					<p>On 1/9/2014, Enova’s employee package with general policies and procedures and a revised Enova Quality Improvement (QI) Plan was received.</p> <p>Although the requirements of Reference No. 620, EMS Quality Improvement Plan, related to the QI Plan have been met in the Enova QI Plan submitted (refer to the attached “EMS Quality Improvement Program Monitoring Instrument”), the following issues were identified:</p> <ul style="list-style-type: none"> • The spaces on the Cover Page for approval signatures (David Malintyan and Dr. Bennett) and approval date are blank. • The QI Plan states “<i>Enova Medical Response currently participates in the Los Angeles county EMS agency’s data collection system, TEMIS by submitting monthly reports for data entry for providers.</i>” [sic]; this statement is not accurate and basic life support only providers DO NOT currently participate in TEMIS. • The QI Indicators that were included with the QI Plan (Attachment 3) lists the Los Angeles County systemwide indicators only; the Enova specific QI indicators were not submitted nor were the tracking and trending results for at least one of the Enova indicators received as previously requested. <p>On 2/19/14, a revised QI Plan which meets the requirements specified in Reference No. 620 was submitted; a cover page that has the appropriate approval signatures and which is dated and that does not indicate that Enova participates in TEMIS data submission has now been included.</p>

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					<p>Although two (2) current indicators were submitted that included definitions, thresholds, the data sources and the time period for each study, they are the systemwide indicators, not Enova specific indicators. Additionally, data collection did not begin until January 2014; therefore quarterly trending and tracking has not been completed at this time.</p>
<p>Non 9-1-1 Medical Dispatch Policies and Procedures</p> <ul style="list-style-type: none"> • Dispatch Policies and Procedures • Qualifications for Dispatchers • Dispatch Logs (most current 90-days) 	<p>7.16.050 (K) (L)</p> <p>Prehospital Care Policy Manual Ref. No. 226</p>		<p>X</p>		<p>A document titled “Communication Protocols” (dated 10/03/2013) and dispatch logs for the period 08/01/2013 through 10/31/2013 were received on 11/04/2013.</p> <p>Review of the Enova “Communication Protocols” found that many of the requirements specified in Reference No. 226, Private Ambulance Provider Non 9-1-1 Medical Dispatch, were not addressed. Refer to the attached “Private Ambulance Provider Non 9-1-1 Medical Dispatch Monitoring Instrument” dated 12/02/2013 for the specific results.</p> <p>Additionally, preliminary review of the Enova dispatch logs identified the following issues:</p> <ul style="list-style-type: none"> • The dispatch logs do include the pick-up and drop-off addresses; however, facility names, (if applicable) are not included. • The logs for October were submitted in a completely different and unacceptable format from the August and September logs. Tracking of the individual calls is virtually impossible as submitted. • The October logs do not include sequential run numbers or patient chief complaints.

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					<ul style="list-style-type: none"> • On the August and September logs it was noted that there were patient transports that may have warranted referral to the 9-1-1 jurisdictional provider; this could not be determined for October as the chief complaints/patient problems were omitted. <p>On 11/20/2013 the submitted dispatch logs were also forwarded to Christopher Rossetti, Ambulance Programs, for review to ensure that patient pick-ups have only been performed in those cities for which Enova is properly licensed. The results of this review were received on 11/25/2013 and the following issues were identified (refer to the attached "Dispatch Log Compliance Report" dated 11/25/2013 for the detailed results):</p> <ul style="list-style-type: none"> • Review for the month of October only found that there were six (6) patient pick-ups at two (2) different addresses in the unincorporated areas of the County. One (1) was in unincorporated Ladera Heights and the other five (5) were in the unincorporated East Los Angeles area. • For the period of August through October 2013 there were also a total of twenty-four (24) patient pick-ups in cities for which Enova business licenses were not received as follows: <ul style="list-style-type: none"> ○ Beverly Hills (5) ○ Burbank (2) ○ Culver City (1) ○ Huntington Park (3)

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					<ul style="list-style-type: none"> ○ Long Beach (1) ○ Monterey Park (1) ○ South El Monte (11) <p>On 1/9/2014 a revised Communications Manual and Dispatch logs for the period October 1, 2013 through December 31, 2013 were received. Additionally, a document titled “<i>Corrective Action Plan From Unincorporated areas of the County</i>” and a document titled “<i>Corrective Action Plan Pick-Ups from cities without a business license</i>”. Each of these documents describes the dispatch procedures that have been implemented to prevent the pick-up of patients in the unincorporated areas of the County or those cities for which Enova is not properly licensed.</p> <p>The patient care records and complete dispatch histories previously requested were not submitted. However, due to the length of time since the initially requested calls occurred, review of the revised dispatch logs submitted on 1/9/2014 was performed and identified potential calls that may have warranted referral to the 9-1-1 jurisdictional provider.</p> <p>Review of the revised Communications Manual found that while many of the requirements specified in Reference No. 226, Private Ambulance Provider Non 9-1-1 Medical Dispatch, have been addressed, some deficiencies have been identified. Refer to the attached “Private Ambulance Provider Non 9-1-1 Medical Dispatch Monitoring Instrument” for the specific results of this review.</p>

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					<p>Additionally, preliminary review of the revised dispatch logs submitted found that the calls are not listed in sequential order and it appears that some calls may be missing. Despite the lack of sequential run numbers, on 1/14/2014 the submitted dispatch logs were forwarded to Christopher Rossetti, Ambulance Programs, for review to ensure that patient pick-ups have only been performed in those cities for which Enova is properly licensed. The results of this review were received on 1/14/14 and the following additional issues were identified (refer to the attached "Dispatch Log Compliance Report" dated 1/14/2014 for the specific results):</p> <ul style="list-style-type: none"> • Some of the calls previously identified as patient pick-ups in the unincorporated areas were not accurate due to the formatting of the dispatch logs previously submitted for October. • Review of the revised dispatch logs now found that there were six (6) patient pick-ups at three (3) different addresses in the unincorporated areas of the County. One (1) was in unincorporated Ladera Heights, three (3) were in the unincorporated East Los Angeles area and the other two (2) were in the unincorporated West Carson area. • There were a total of fifty-six (56) patient pick-ups in cities for which Enova business licenses were not received as follows: <ul style="list-style-type: none"> ○ Baldwin Park (1) ○ Beverly Hills (13) ○ Carson (16)) ○ Covina (1) ○ El Segundo (1) ○ El Monte (9)

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					<ul style="list-style-type: none"> ○ Monrovia (1) ○ San Gabriel (1) ○ South El Monte (13) <p>On 2/19/14 the following items were received:</p> <ul style="list-style-type: none"> ● Revised dispatch policies and procedures ● A written statement regarding the assignment of run numbers by the Enova CAD system. ● Copies of additional/newly obtained city business licenses for the following cities: <ul style="list-style-type: none"> ○ Carson ○ El Monte ○ South El Monte ● Enova did not have business licenses for one or more of the cities identified above during the period 10/1/2013 through 12/31/2013, and submitted a revised corrective action plan regarding how Enova will ensure that patient pick-ups occur only in those cities for which a current business license is held. ● Patient care records (PCRs) previously requested were submitted. <p>The following issues were identified related to the above submitted dispatch policies and procedures, the dispatch logs and the PCRs:</p> <ul style="list-style-type: none"> ● While many of the requirements specified in Reference No. 226 have been met, there are still some deficiencies as identified in the attached “Private Ambulance Provider Non 9-1-1 Medical Dispatch Monitoring Instrument”. ● Although, a written explanation/clarification regarding why calls listed on the submitted dispatch logs do not have sequential run

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					<p>numbers assigned by the CAD system and how it is determined that <u>all</u> calls have been included in the dispatch reports. However, it is unclear why the completed calls are not listed in sequential order and there is no mechanism for the EMS Agency to reconcile that all calls are included in the dispatch report provided.</p> <ul style="list-style-type: none"> • The complete dispatch histories for the PCR's that were received were not submitted as requested. • Review of the patient care records determined that several transports did warrant referral to the 9-1-1 jurisdictional provider and the documentation on the patient care record does not substantiate the rationale for the failure to activate 9-1-1.
ADDITIONAL INFORMATION					
<p>Unannounced Site Visit</p> <ul style="list-style-type: none"> • Facility Tour • Patient Care Record (PCR) Transfer Process • Quality Improvement (QI) Review • Dispatch/Communications Review • EMT Interview 					<p>On 2/25/14, EMS Agency personnel performed an unannounced site visit at the Enova Headquarters location. Following is a summary of the site visit review:</p> <ul style="list-style-type: none"> • The facility tour confirmed the business facilities description that was submitted with the application and the description of the PCR transfer process from EMT completion through billing. The Billing Manager was available for interview at the time of the site visit and confirmed processes as described. Patient records storage was adequate and in compliance with the requirements for PHI.

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					<ul style="list-style-type: none"> • Review of the QI Program found the following: <ul style="list-style-type: none"> ○ QI data is currently being collected and documented on data collection worksheets. ○ A process for a 100% review of patient care records for completeness was verbalized. ○ There is minimal trending and tracking of data at this time due to initiation of the QI program did not begin until January 2014 as identified in the QI review section above. Proper completion of this documentation was discussed with the QI Coordinator and Enova Management at the time of the site visit. ○ Minimal education regarding the QI process has been provided to field personnel. Additionally, the Medical Director has been minimally involved with the QI process to date and has not done formal case reviews. • The on-duty dispatcher was able to verbalize to EMS Agency personnel how she would access a supervisor/manager after hours and was able to describe her process for handling calls that warrant referral to the 9-1-1 jurisdictional provider. Dispatchers had a list of cities where Enova currently holds business licenses in and demonstrated how they confirmed if an address was in an area of the County that they were licensed to pick up in. The on-duty dispatcher was also able to verbalize the process for turning down a call when the address was in a jurisdiction for which they are not licensed.

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					<ul style="list-style-type: none"> • During the dispatcher interview process it was stated that if a call warranted referral to the 9-1-1 jurisdictional provider that the caller would be told to contact 9-1-1; however, the dispatch policies and procedures states "...The dispatcher shall instruct the caller to stay on the line while the dispatcher notifies 9-1-1." • An on-duty EMT crew was interviewed and following is the results of this interview: <ul style="list-style-type: none"> ○ A verbal overview of their process when they start their shift and when they finish their shift and how they could reach a supervisor after hours was provided. ○ When presented with a scenario of a patient who deteriorates enroute to a facility, they indicated they would immediately contact dispatch to verify the most accessible receiving (MAR) facility for diversion of the patient. ○ When presented with a scenario of arriving at a skilled nursing facility and finding a patient in severe distress, they were able to verbalize their immediate actions (i.e., apply oxygen, elevate patient's head, etc.) and activation of the 9-1-1 system by calling from the facility or contacting dispatch for assistance. ○ Crew members were unaware of the QI process or current QI indicators that Enova is monitoring.

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<u>Additional Information Requested by the EMS Agency</u>			X		Refer to the above “OMITTED or INCOMPLETE” items as specified in the preceding sections of this Summary
<u>Additional Information Requested by the Ambulance Licensing Hearing Board</u>				X	Public Hearing scheduled for March 5, 2014

02/2014 – Third Review